

Kenneth E. Lyon, III
Nevada Bar Number 7071
Law Offices of Kenneth E. Lyon, III
10389 Double R Blvd.
Reno, Nevada 89521
Telephone: (775) 398-5800
Facsimile: (775) 398-5801

Attorney for
GGW GLOBAL BRANDS, INC.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re

GGW BRANDS, LLC *et al.*

Debtors.

WYNN LAS VEGAS LLC dba WYNN LAW
VEGAS, a Nevada limited liability company

Plaintiff, Counterclaim
Defendant

v.

GGW DIRECT, LLC, a Delaware limited liability company; GGW BRANDS, LLC, a Delaware limited liability company; GGW EVENTS, LLC, a Delaware limited liability company; MANTRA FILMS, INC., a suspended Oklahoma corporation; BLUE HORSE TRADING, LLC, a California limited liability company; PEPE BUS, LLC, an inactive Montana limited liability company; SANDS MEDIA, INC., a revoked Nevada domestic corporation; JOSEPH R. FRANCIS, an individual; DAVID R. HOUSTON, an individual; and DAVID R. HOUSTON, LTD., a Nevada professional corporation, doing business as THE LAW OFFICE OF DAVID R. HOUSTON,

Defendants

Caption continued

Adv Proc.: 13-01050-MMN

Chapter 11

ANSWER TO COMPLAINT,
COUNTERCLAIM AND CROSSCLAIM BY
GGW GLOBAL BRANDS, INC.

GGW GLOBAL BRANDS, INC., as successor
in interest of certain assets of PEPE BUS, LLC

Counterclaimant and
Crossclaimant

v.

WYNN LAS VEGAS LLC d/b/a WYNN LAS
VEGAS

Counterclaim Defendant

-and-

GGW DIRECT, LLC; GGW BRANDS, LLC;
and GGW EVENTS, LLC

Crossclaim Defendants

GGW GLOBAL BRANDS, INC., as successor in interest of certain assets of PEPE BUS, LLC, hereby files the following Answer to plaintiff's Complaint, Counterclaims, and Crossclaims:

ANSWER

1. GGW GLOBAL BRANDS, INC. denies the allegations in paragraphs 7, 13, 19, 20, 21, 22, 23, 24, 25, 26, 22, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39.
2. GGW GLOBAL BRANDS, INC. does not have sufficient knowledge or information that the allegations in the following paragraphs are true and therefore deny them: 1, 2, 3, 4, 5, 6, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 41.
3. Defendants admit the allegations contained in paragraph 27 to the extent it relates to assets received from PEPE BUS, LLC, predecessor in interest of GGW GLOBAL BRANDS, INC. with respect to such assets, and paragraph 29.
4. Defendants answer the following paragraphs with the same responses as the paragraphs incorporated by reference by the following paragraphs: 28, 36, 40.
5. Except as expressly provided herein, GGW GLOBAL BRANDS, INC. denies all of the allegations in the Complaint.

COUNTERCLAIMS AND CROSSCLAIM FOR DECLARATORY JUDGMENT

6. GGW GLOBAL BRANDS, INC. realleges all paragraphs of its Answer.

7. All funds held in bank accounts controlled by HOUSTON which are the subject of this litigation were previously owned by PEPE BUS, LLC.

8. GGW GLOBAL BRANDS, INC., pursuant to an Assignment from PEPE BUS, LLC, is successor in interest to all such funds held in the bank accounts controlled by HOUSTON which are the subject of this litigation.

9. WYNN LAS VEGAS, LLC, GGW DIRECT, LLC, GGW BRANDS, LLC and GGW EVENTS, LLC all wrongfully have made claims to such funds.

10. A justiciable controversy exists as to who owns the funds held in the bank accounts controlled by HOUSTON which are the subject of this litigation.

PRAYER FOR RELIEF

WHEREFORE, GGW GLOBAL BRANDS, INC. prays for the following relief:

1. That WYNN LAS VEGAS take nothing from its Complaint;
2. That the Court issue a declaration that the funds held in the bank accounts controlled by HOUSTON belong to, and are the sole property of, GGW GLOBAL BRANDS, INC.
3. For an award of reasonable costs; and
4. For any additional relief this Court deems just and proper.

DATED: August 14, 2013

By: / S / KENNETH E. LYON, III

Attorney for GGW GLOBAL BRANDS,
INC.

CERTIFICATE OF SERVICE

1. On August 14, 2013 and August 15, 2013 I served the following document:

ANSWER TO COMPLAINT, COUNTERCLAIM AND CROSSCLAIM BY GW
GLOBAL BRANDS, INC.

2. I served the above-named document by the following means to the persons listed
below:

X ☐ ECF System

X ☐ United States mail, postage fully prepaid

Mitchell J. Langberg, Esq.
Brownstein Hyatt Farber Schreck LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106

Malhar S. Pagay, Esq.
Pachulski Stang Ziehl & Jones LLP
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067

Robert M. Yaspan, Esq.
21700 Oxnard St., Ste. 1750
Woodland Hills, California

David R. Grundy, Esq.
LEMONS, GRUNDY & EISENBERG
6005 Plumas Street, Third Floor
Reno, Nevada 89509

Andre M. Lagomarsino, Esq.
PARKER SCHEER LAGOMARSINO LLP
9555 South Eastern Avenue, Suite 210
Las Vegas, NV 89123

David M. Stern, Esq.
KLEE TUCHIN BOGDANOFF & STERN LLP
1999 Avenue of the Stars, Thirty-Ninth Floor
Los Angeles, CA 89123

I declare under penalty of perjury the foregoing is correct and true.

/s/ Kenneth E. Lyon, III